

UNITED STATES DISTRICT COURT
Northern District of Texas
Lubbock Division

CHRISTOPHER SCOTT

V.

INTEGRITY RECOVERY
MANAGEMENT, LLC

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CASE NUMBER: 5:19-cv-007-C

**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT
AGAINST INTEGRITY RECOVERY MANAGEMENT, LLC**

NOW COMES the Plaintiff, CHRISTOPHER SCOTT, by and through his attorney, Daniel J. Ciment with the Ciment Law Firm, PLLC, and hereby moves this Honorable Court to hold Defendant, INTEGRITY RECOVERY MANAGEMENT, LLC, in default for its failure to appear, answer, or otherwise plead in the above captioned action. In support thereof, Plaintiff states as follows:

1. Plaintiff filed his Original Complaint with this Court on January 17, 2019;
2. Defendant was served on February 11, 2019. A true and exact copy of the return of service is attached hereto as Exhibit A. (dkt #5);
3. An answer or other responsive pleading was due on or before March 4, 2019;
4. After a complete review of the court docket, Plaintiff has determined that the Defendant has failed to answer or otherwise plead;
5. Plaintiff requests a hearing to prove up his damages.

WHEREFORE, Plaintiff, Christopher Scott, moves this Honorable Court to enter an order defaulting Defendant INTEGRITY RECOVERY MANAGEMENT, LLC.

DATED: April 30, 2019

Respectfully submitted,

Ciment Law Firm, PLLC

/s/ Daniel J. Ciment

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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

On April 30th, 2019, I served the documents described as:

- 1) Motion for Entry of Default,
- 2) Memorandum in Support of Entry of Default Judgment,
- 3) Affidavit of Amount Due, and
- 4) Proposed Order

On all interested parties in this action by placing a true and correct copy thereof in a sealed envelope, with first class postage prepaid thereon, and deposited said envelope in the United States mail at or in Houston, Texas.

NATIONAL JUDGMENT RECOVERY CENTER, LP
C/O Patrick O'Connor
2200 North Loop West, Suite 200
Houston, TX 77018

/s/ Daniel J. Ciment

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